

EXHIBIT 6

M & S Texaco (2619 S. East Avenue)

- Deposition of Jatinder Paul Dhillon, pgs. 17, 30-31, 36-37, 43-46, 49-50, 53-54, 71-72, 99, 143-147 (Aug. 11, 2011)
- Shell Defendants' Response to City of Fresno's First Set of Interrogatories, Exh. B at p. 8

Deposition of Jatinder Paul Dhillon / August 11, 2011

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-oOo-

In re: Methyl Tertiary Butyl
Ether ("MTBE") Products
Liability Litigation

Master File No.
1:00-1898

This Document Relates To:

City of Fresno
v. Chevron U.S.A. Inc., et al.,
Case No. 04 Civ. 4973

Case No.
MDL 1358(SAS)

DEPOSITION OF JATINDER PAUL DHILLON

August 11, 2011 at 9:00 (9:05) a.m.

Before: ERIC L. JOHNSON
RPR, CSR #9771

Taken at:
Fresno, California

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1 A. Yes.

2 Q. If there's something, again, you just don't
3 remember, just please let us know instead of guessing.

4 Have you consumed any medication, including
5 prescription drugs or alcohol, that might affect your
6 ability to recollect events and give testimony here
7 today?

8 A. No, I don't think so. No.

9 Q. You are not -- you are not having any problems
10 or issues with memory today or anything like that?

11 A. No.

12 Q. And we will be able to take breaks at any time
13 you need to, or anyone else does, or if we have to
14 change the video every once in a while we will be happy
15 to take a break. So just let us know if you'd like a
16 break.

17 Do you have any questions about the deposition
18 process?

19 A. No.

20 MR. EICKMEYER: Now, I am going to hand you
21 what I have marked as Exhibit 1.

22 (Deposition Exhibit 1 marked
23 for identification)

24 MR. EICKMEYER: This is a deposition notice and
25 subpoena. It looks like you may have brought a copy

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1 with you as well.

2 Q. Now, the first page notice of the deposition
3 you may not have seen, but if you turn forward one page
4 you see there is a subpoena to testify there.

5 Do you recall having received the subpoena?

6 A. Yes.

7 Q. And that's the reason that you are here to
8 testify today?

9 A. Yes.

10 Q. I would ask you to turn forward in the packet
11 stapled together about three more pages, there is a list
12 starting with the word "Attachment."

13 Do you see that list?

14 A. Yes.

15 Q. Did you have a chance to look at the attachment
16 to see if you had any of the documents requested there?

17 A. I don't have any documents right now for these
18 things. No.

19 Q. Let me ask you, we will go through kind of a
20 time-line, but for the station address I mentioned, the
21 2619 South East Avenue, are you still affiliated with
22 that station today?

23 A. No.

24 Q. Do you recall, for example, question one asking
25 about any bills of lading? Were there any such records

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1 that you had put into storage or placed somewhere for
2 safekeeping after you stopped being affiliated with that
3 station?

4 A. We don't have any documents that long, no. We
5 destroy them after five years.

6 Q. So they are -- they are not in any kind of a,
7 you know, storage warehouse or anything like that to the
8 present time, to your understanding?

9 A. I don't know.

10 Q. You are not aware of any documents, then, that
11 were kept to the present day?

12 A. Present date, I don't remember. No.

13 Q. Did you bring any documents with you today
14 beside your copy of the subpoena?

15 A. No.

16 Q. Have you had a chance to look through all of
17 the different categories there? It goes on for, let's
18 see, item Numbers 1 through 35 over the next few pages.

19 A. Yes, I have gone through, yes.

20 Q. You went through there and you didn't find you
21 had any records still?

22 A. Not any record right now.

23 Q. Okay. You can set that aside, then. Thank
24 you.

25 Now, is it correct, just to make sure we have

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1 the -- the address right, the street is called East
2 Avenue; is that right?

3 A. Yes.

4 Q. Do you recall when you first became affiliated
5 with the station at 2619 South East Avenue?

6 A. Repeat the question.

7 Q. Well, maybe I can ask it better. Do you recall
8 when you first started working there or had any
9 ownership or interest in it?

10 A. I don't know exactly, but I think '95, '96.

11 Q. Did you franchise it or purchase it, or what
12 was your relationship initially?

13 A. We purchased the business.

14 Q. When you say "we purchased the business," who
15 was that that purchased the business?

16 A. I purchased the business.

17 Q. Did you have any partners, for example?

18 A. No.

19 Q. Were you doing business under your own name or
20 did you have any kind of a company set up?

21 A. M&S Texaco.

22 Q. The letters M&S?

23 A. S, Texaco.

24 Q. Was it called M&S before you took over the
25 station?

5 (Pages 14 to 17)

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1 spill. Were you given instructions on what to do for a
2 large spill?

3 A. The large spill, we have to call the fire
4 department and we also, they called some company who
5 cleaned those kind of mess.

6 Q. Did they explain to you in your training where
7 was the difference between a small spill and a large
8 spill?

9 A. Yes. Tells you in the training package, yes.

10 Q. And what was that difference?

11 A. I don't remember.

12 Q. Do you recall if it was a spill of a certain
13 number of gallons or how that was decided?

14 A. Yeah, the gallons, more than a gallon, that's a
15 big spill.

16 Q. So if it was a large spill, you indicated you
17 were to call the fire department and then some other
18 service?

19 A. Some other service to clean it, yes.

20 Q. At the -- again, the station at 2619 South East
21 Avenue, do you recall whose responsibility it would have
22 been to use the cat litter-type product if there was a
23 small spill?

24 MR. YBARRA: Objection; calls for a legal
25 conclusion.

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1 THE WITNESS: The manager or -- or cashier,
2 whoever is working there.

3 MR. EICKMEYER: Q. At the 2619 South East
4 Avenue station, were you considered the manager there?

5 A. Yes.

6 Q. Did you have any other people over the years
7 you operated that who were your managers?

8 A. We have lot of help, like cashiers and one
9 assistant manager, yes.

10 Q. Do you recall the names of any of the managers
11 at that station?

12 A. I don't remember.

13 Q. There may be some names we have seen on
14 documents if it helps refresh your recollection.

15 At the 2619 South East Avenue station, do you
16 recall if there would be occasions where a customer had
17 the nozzle in their car and overfilled their car so that
18 any gas spilled or leaked on the ground?

19 A. That's the only way it spills there, yeah.

20 Q. About how often would that happen at 2619 South
21 East Avenue?

22 A. Very hard to answer. Sometime maybe that
23 happen for six months, one time it happen every day, two
24 days in a row, so --

25 Q. When that type of overfill would happen, do you

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1 recall what the approximate size of the discoloration on
2 the ground was?

3 A. The gas mostly evaporates, we put the litter
4 there and we sweep it up. And there's not much change
5 in the color, no.

6 Q. Do you recall seeing any discoloration on the
7 ground when an overfill would occur?

8 A. Not really. No.

9 Q. Do you recall if there were times when a
10 customer would take the nozzle out of their car and
11 there would be any drips of gasoline from the nozzle to
12 the ground?

13 A. It happened sometimes.

14 Q. Do you recall how often on average that would
15 occur?

16 A. I can't answer that.

17 Q. Do you recall when that occurred how large any
18 discoloration on the ground was?

19 A. Because most of it is concrete. And there's no
20 decoloration, just the spot. You can see the spot
21 there, then you clean it and after time we always wash
22 the islands, and it dissipates.

23 Q. Do you recall how large the spots were that
24 would be on the ground? Can you tell me in inches or
25 what size it would have been?

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1 A. Maybe six, seven-inch round circle. You can
2 see like that.

3 Q. Now, you mentioned washing the area down. Was
4 that hosed down, or how would that occur?

5 A. We -- we don't wash them particular like that
6 way because we use cat litter to clean it. And we do
7 like once a week or something like that in the nighttime
8 to clean all the island, parking lot and everything.

9 Q. So in the schedule you mentioned on once a
10 week, where would the water go that was used to clean
11 off the concrete? Was that running to a drain or the
12 street, or where would that water go?

13 A. Water goes in the -- in the gutter that time,
14 yes.

15 Q. Now, do you recall if there were ever any
16 occasions where someone left the nozzle in their car and
17 started to drive away?

18 A. It happens. Yes.

19 Q. On average, how often would that happen at
20 2619 South East Avenue?

21 A. Three, four time a year.

22 Q. On those occasions where you had -- was that
23 sometimes called a drive off?

24 A. Drive off we call them. Yes.

25 Q. When there was a drive off, were there times

9 (Pages 30 to 33)

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1 when any gasoline would come out of the rubber hose
 2 onto the ground?
 3 A. No, not really, no.
 4 Q. When you say "not really, do you remember, was
 5 there --
 6 A. No.
 7 Q. -- a small amount or --
 8 A. Maybe one drop or something like that. Drop
 9 maybe. Half-inch drop.
 10 Q. Would there be any gas in the hose that would
 11 come out to the ground if they were driving off?
 12 A. I think so, yes.
 13 Q. Do you recall any occasions where anyone, car
 14 or vehicle, ran into one of the gas pumps or gas
 15 dispensers?
 16 A. It happened one time, yes.
 17 Q. At the East Avenue station?
 18 A. That's what we are talking about, that same
 19 station, yes.
 20 Q. Yeah, yeah, right, unless we say another
 21 address. Yes.
 22 A. Yes.
 23 Q. Can you tell us what happened in that incident?
 24 A. I think somebody backed up into the dispenser.
 25 Q. Do you recall -- sorry. Were you done?

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1 A. And damaged the pump, yes.
 2 Q. Do you recall if there was any release of
 3 gasoline during that incident?
 4 A. None.
 5 Q. Do you recall approximately what year that
 6 occurred where someone backed into a dispenser?
 7 A. I am not sure, but approximately 2001, or
 8 something like that.
 9 Q. When someone backed into the dispenser, was the
 10 fire department called at that time?
 11 A. No.
 12 Q. Now, you mentioned you had instructions, I
 13 think what you described as a large spill, you would
 14 call the fire department and another cleanup service.
 15 Were there any times that you had to call the fire
 16 department to respond to the East Avenue station?
 17 A. Yes.
 18 Q. When did that occur, if you recall
 19 approximately the date?
 20 A. One time. No, I don't remember the date. No.
 21 Q. Do you recall if that was in the '90s or 2000s?
 22 A. 2000s.
 23 Q. Can you describe for us what happened in that
 24 occasion?
 25 A. What exactly do you mean about that?

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1 Q. Well, what happened that caused you to have to
 2 call the fire department?
 3 A. I think some -- some truck was filling a gas
 4 and he spill it. And the puddle was big so we have to
 5 call them.
 6 Q. When you say it was big, do you recall how many
 7 feet or --
 8 A. Half a gallon -- maximum is not even a gallon.
 9 Less than a gallon.
 10 Q. Was that the Fresno Fire Department that
 11 responded?
 12 A. Yes.
 13 Q. I am not sure if I asked you this, but I think
 14 you indicated, is it correct you are not still currently
 15 operating the station at East Avenue?
 16 A. I am not right now. I am not operating that
 17 one, no.
 18 Q. What year did you stop operating the East
 19 Avenue station?
 20 A. January 2009.
 21 Q. So the incident involving the fire department,
 22 would you say that was in the earlier or the mid or the
 23 later 2000s?
 24 A. I don't remember in particular. I don't
 25 remember.

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1 Q. Do you recall if there were any occasions where
 2 a gas nozzle would malfunction and not shut off
 3 properly, and continue dripping gasoline?
 4 A. I am not sure.
 5 Q. Who is responsible for maintenance of the gas
 6 nozzles or dispensers at East Avenue?
 7 A. I was.
 8 Q. Was that true during the entire time you
 9 operated that station?
 10 A. Yes.
 11 Q. Now, you mentioned when you purchased the
 12 business it was initially M&S Texaco; is that right?
 13 A. That was my company when I buy it.
 14 Q. Is that what -- what you referred to the
 15 station as or was it called -- the station called
 16 something else?
 17 A. Before I buy it?
 18 Q. No, when you bought it. Sorry, when you first
 19 bought it.
 20 A. When I bought it I gave my company name to
 21 that. Before that it was a different name.
 22 Q. Okay. Well, that's right. That's what I
 23 wanted to ask you about. But is it correct, then,
 24 when -- when you bought it initially it was M&S Texaco?
 25 A. Yes.

10 (Pages 34 to 37)

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1 Q. Do you recall about how often there would be
 2 deliveries from Bakersfield terminal compared to Fresno?
 3 A. I don't remember.
 4 Q. Was that a relatively small number that came
 5 from Bakersfield?
 6 A. I don't remember.
 7 Q. Now, beside the terminal, did you ever hear
 8 what refinery had originated the gas being delivered?
 9 A. I don't know.
 10 Q. When you first took over the business, how was
 11 it that you would order gasoline, through a phone call
 12 or what kind of system?
 13 A. Phone call.
 14 Q. And when you started operating the business,
 15 who was it you would call for gasoline?
 16 A. Texaco company, then the Shell, then they sold
 17 to the jobber.
 18 Q. When you say they sold it to a jobber, do you
 19 recall who that was, the jobber?
 20 A. They call R.M. Parks.
 21 Q. Sorry --
 22 A. Jobber name is R.M. Parks.
 23 Q. Oh, R.M. Parks?
 24 A. Mm-hmm.
 25 Q. Do you recall what year that was transferred

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1 from Shell to the jobber?
 2 A. I don't know exactly. It is in 2000s.
 3 Q. And that change occurred during the years the
 4 station was branded Shell?
 5 A. Yes.
 6 Q. When R.M. Parks was delivering gasoline, was it
 7 your understanding that was still Shell branded
 8 gasoline?
 9 A. Yes.
 10 Q. Do you remember the names of any of the
 11 delivery truck drivers who delivered gas to the station?
 12 A. I think they use a private carriers, so I don't
 13 know.
 14 Q. I mean, just from talking to them, do you
 15 remember the names of any drivers?
 16 A. No.
 17 Q. Now, we will take a look at some documents here
 18 in a moment, but is it correct at the station that there
 19 were underground storage tanks to hold the gasoline
 20 before it was sold to the customers?
 21 A. Repeat the question, please.
 22 Q. Well, I am just trying to ask, is it -- is it
 23 correct that you had underground storage tanks that held
 24 the gas before it was dispensed to the customers?
 25 A. Yes.

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1 Q. When you first took over the business, did you
 2 have an understanding as to who owned the underground
 3 storage tanks?
 4 A. The landlord. The landlord who owns the
 5 property.
 6 Q. When you first took over the business, do you
 7 know who that landlord was?
 8 A. Mr. Pickett (sic).
 9 Q. Did you ever purchase the land at the station?
 10 A. No.
 11 Q. Were you aware if the landowner ever changed
 12 from Mr. Prickett to someone else?
 13 A. He had a trust. Everything goes through the
 14 trust.
 15 Q. Beside Mr. Prickett and then his trust, do you
 16 recall if there were any other landowners and property
 17 owners at the station?
 18 A. No.
 19 Q. So is it your understanding at the time you
 20 stopped operating the station it was owned by
 21 Mr. Prickett or his trust?
 22 A. Yes.
 23 Q. Now, I understand, and we will see some
 24 documents, there was -- do you recall a change or
 25 replacement in the underground storage tanks at some

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1 point?
 2 A. Yes.
 3 Q. After those tanks were changed, did you have an
 4 understanding as to who owned the tanks?
 5 A. Landlord.
 6 Q. Was it your understanding the landlord
 7 continued to own the tanks during the entire time you
 8 operated the station?
 9 A. Yes.
 10 Q. Now, do you recall if there was a piping that
 11 would have connected the underground storage tanks to
 12 the dispensers?
 13 A. There is piping connecting those, yes.
 14 Q. All right. I assumed there was, I just wanted
 15 to make sure. I am not trying to put words in your
 16 mouth.
 17 Do you recall when you first took over the
 18 station who owned that piping?
 19 A. Landlord.
 20 Q. And is it correct that piping would have been
 21 replaced when the underground tanks were replaced?
 22 A. Yes.
 23 Q. So after the newer piping went in, who did you
 24 consider to own the piping?
 25 A. Landlord.

12 (Pages 42 to 45)

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<p>1 Q. Now, is it correct when you started operating 2 the station you had some -- as we have talked about, you 3 had some gas dispensers there, right? 4 A. Yes, there are dispensers there, yes. 5 Q. When you first took over the business, who was 6 considered to own the gas dispensers? 7 A. I think me. 8 Q. And is it correct those dispensers were changed 9 out with the underground storage tanks? 10 A. Yes. 11 Q. So after that change was made, who was 12 considered to own the dispensers? 13 A. Landlord paid for that. 14 Q. The landlord paid for the new dispensers? 15 A. Yes. 16 Q. And so after that change who was considered to 17 own them? 18 A. I think landlord. 19 THE WITNESS: Can we take a break for two 20 minutes? 21 MR. EICKMEYER: Sure. We can go off the 22 record. 23 THE VIDEOGRAPHER: One moment, please. The 24 time is 9:46 a.m. and we are going off the record. 25 (Break taken at 9:46 a.m.)</p>	<p>1 Q. Now, what I want to ask you about is toward the 2 bottom of this page under the second dark line, it has 3 got checked "business name change." Do you see that? 4 A. On the bottom? 5 Q. Yeah. Underneath the second dark line 6 there's -- there's something that's kind of scratched 7 out, and then next to it has checked "business name 8 change"? 9 A. Yes. 10 Q. And then two lines below that is written in on 11 the comments line, looks like it says, "Lease change but 12 no change on tank ownership." 13 Do you see that? 14 A. Lease change -- yes. 15 Q. Below that it says Business name Jensen 99 16 Texaco. Do you see that? 17 A. Yes. 18 Q. Is it your understanding that before you 19 operated the business, was that the name of it was 20 Jensen 99 Texaco? If you know. 21 A. I'm not sure, no. 22 Q. To the right of that business name, owner, 23 looks like it has Glen and Shirley -- 24 A. Prickett. 25 Q. -- Prickett written in?</p>
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<p>1 THE VIDEOGRAPHER: The time is 9:49 a.m. and we 2 are back on the record. 3 MR. EICKMEYER: Mr. Dhillon, I'm handing you 4 what I have marked as Exhibit 2. 5 (Deposition Exhibit 2 marked 6 for identification) 7 MR. EICKMEYER: When we start with a document, 8 I will take just a moment and identify it for the 9 record. If you ever need time to read the document or 10 look at it more, we will be happy to do that. I will 11 usually ask you some particular questions about the 12 document, but if you ever want time to look at something 13 we will be happy to do that, if you just let us know. 14 Exhibit 2 is titled Fresno County Health 15 Services Agency Environmental Health Application. There 16 is a date down at the bottom right, lower date is 17 1/26/95. Bates is FCDEH-FRESNO-050253. 18 Q. Mr. Dhillon, do you see the station we have 19 been talking about at the top listed as M&S Texaco 20 No. 105, and that would be the station on East Avenue 21 that we have been discussing? 22 A. Yes. 23 Q. It has got your name about the middle of the 24 page, Attention: Paul Dhillon. Do you see that? 25 A. Yes.</p>	<p>1 A. Yes. 2 Q. Does that refresh your recollection as to who 3 Mr. Prickett was? 4 A. Yes. 5 Q. So the date that's on here, there's two dates 6 at the bottom right, looks like January 24th, 1995 and 7 January 26th, 1995. Do you recall if that would have 8 been the approximate time that the business was changed 9 to your operation? 10 A. Yes. 11 Q. I am wondering, it has the word lease mentioned 12 that I read. Did you have a lease for the station or 13 for the property, to your recollection? 14 A. Yes. 15 Q. So did you have an agreement with Mr. Prickett 16 as well as with Texaco, or who were you dealing with? 17 MR. YBARRA: Objection; misstates the 18 testimony. 19 MR. EICKMEYER: Q. You can answer after the 20 objection is done. I am just -- I am trying to figure 21 out, did you have a lease with the property owner as 22 well as an agreement with Texaco, or who was it that you 23 were dealing with? 24 A. The property was leased with the property 25 owner, that's Glen Prickett. And Texaco was our</p>

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1 supplier, so we had a contract for the supplies.

2 Q. So you had your own lease with the Pricketts,
3 the property owners?

4 A. Yes.

5 Q. Was that an arrangement that you were
6 continuing to lease the property during the entire time
7 you operated that station?

8 A. Yes.

9 Q. Did you consider yourself to have a franchise
10 agreement with Texaco?

11 MR. YBARRA: Objection; misstates the
12 testimony, calls for speculation.

13 THE WITNESS: Because "franchise" word is -- it
14 is not very -- I can understand it is not a franchise.
15 From my understanding franchise is differently. But we
16 buy the gas from them, that was my supplier, Texaco was
17 my supplier.

18 MR. EICKMEYER: Q. Would it be more accurate
19 to say you had a supply agreement with Texaco?

20 A. Yes.

21 Q. And then later that was an agreement with
22 Shell? When it changed --

23 A. They were my suppliers.

24 Q. Right. So I am just saying when it changed
25 from Texaco to Shell, then you had a supply agreement

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1 with Shell.

2 A. Yes.

3 Q. So during the years it was branded Texaco, you
4 didn't obtain gas from any other source than Texaco?

5 A. No.

6 Q. During the years it was branded Shell, is it
7 correct you didn't obtain gas from any other source than
8 Shell?

9 A. No.

10 Q. I am sorry, I kind of asked that as a negative.
11 So that is correct, then, what I said? Let me try
12 again.

13 Is it correct that during the years it was
14 branded Shell you didn't obtain gas from any other
15 source than Shell?

16 A. I would say yes, because I bought it from the
17 jobber after that. The jobber is a different source
18 than Texaco. It is a different -- he was selling me
19 Texaco brand, but it is a different person, so I don't
20 know where he's getting gas from.

21 Q. Oh, I am sorry if I -- I may have -- maybe I
22 didn't understand earlier. Was the jobber during the
23 Texaco years or the Shell years?

24 A. Shell years.

25 Q. Okay. Was it your understanding the jobber was

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1 selling you Shell branded gas, or did you have an
2 understanding?

3 A. That's what contract says, yes.

4 Q. So is it correct, maybe if I can summarize it
5 this way, is it your understanding, then, you were
6 always buying company branded gas either from Texaco or
7 then Shell?

8 A. Yes.

9 (Deposition Exhibit 3 marked
10 for identification)

11 MR. EICKMEYER: Let me show you what I am
12 marking as Exhibit 3. Exhibit 2, you can just put
13 aside in the pile if you'd like. Exhibit 3 is the
14 letterhead of Fresno County Health Services Agency,
15 date November 13, 1995, addressed to Mr. Dhillon.
16 Bates is FCDEH-FRESNO-050249 through 050252.

17 Q. Mr. Dhillon, do you recall having received this
18 letter?

19 A. My signature. Yes.

20 Q. And I was going to get to that, on the third
21 page of the packet, Bates ending in 251. Do you
22 recognize your signature where it says "Received By"?

23 A. Yes.

24 Q. And at the bottom of the last page in the
25 packet Bates ending in 252, would that be your signature

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1 at the bottom left?

2 A. Yes.

3 Q. Now, on the -- going back to the front of the
4 packet, the Bates ending in 249, under your name I see
5 there's an address on Huntington Boulevard. Was that
6 your home address, or what was that?

7 A. That's the landlord's address.

8 Q. Oh, the Pricketts' address?

9 A. Pricketts' address.

10 Q. I want to ask you about some of the numbered
11 items on the first page. It says No. 1, Annual tank
12 test -- sorry. "Annual tank tightness tests have not
13 been performed. Tests must be performed annually," end
14 quote.

15 Do you recall being told this by the county
16 inspector, that there needed to be annual tank tightness
17 tests?

18 A. Yeah, that's what the letter says. Yes.

19 Q. Do you recall if you took any action in
20 response to this letter?

21 A. Yes.

22 Q. Whose responsibility was it during this 1995
23 time frame to conduct tank tightness tests?

24 A. Mine. I was responsible.

25 Q. Did that responsibility ever change during the

14 (Pages 50 to 53)

<p style="text-align: right;">Page 54</p> <p>1 years you operated that station?</p> <p>2 A. No.</p> <p>3 Q. For item No. 2, it says, "Line leak detectors</p> <p>4 have not been installed. Detectors must be installed,</p> <p>5 maintained, and tested annually," end quote.</p> <p>6 Do you recall taking any action in response to</p> <p>7 that?</p> <p>8 A. Yes.</p> <p>9 Q. What did you do?</p> <p>10 A. To get the things done what they want us to do.</p> <p>11 Q. Do you recall if you hired a company or service</p> <p>12 to --</p> <p>13 A. Yes.</p> <p>14 Q. -- install any detectors?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recall if you had any conversations with</p> <p>17 Kerry Oil, Mr. Kerry or the company, as to why there had</p> <p>18 not been any line leak detectors installed before?</p> <p>19 A. I think they were not required before that.</p> <p>20 Q. No. 3 says, "A hazardous materials business</p> <p>21 plan has not been updated. A current business plan must</p> <p>22 be submitted to this office," end quote.</p> <p>23 Do you recall if you took any response in</p> <p>24 regard to that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 "Inventory reconciliation or tank gauging annual summary</p> <p>2 reports are not being submitted. Annual summary reports</p> <p>3 must be submitted to this office," end quote.</p> <p>4 Do you recall if you took any response to that</p> <p>5 item?</p> <p>6 A. We gave them the copies. We never knew that we</p> <p>7 were supposed to, but at that time the law changed, we</p> <p>8 give them all the copies, yes.</p> <p>9 Q. Now, when it mentions inventory reconciliation</p> <p>10 or tank gauging, was there something being done at this</p> <p>11 time frame, 1995, to check the amount of gas in the</p> <p>12 underground storage tanks?</p> <p>13 A. Yes.</p> <p>14 Q. We have heard from other witnesses about taking</p> <p>15 a stick measurement. Were you doing that kind of</p> <p>16 process?</p> <p>17 A. That time it was stick, yes.</p> <p>18 Q. Did that later change from stick measurement to</p> <p>19 something else?</p> <p>20 A. Something else, yes.</p> <p>21 Q. Do you recall, did that change when the tanks</p> <p>22 were replaced or when did that change?</p> <p>23 A. When the tanks were replaced.</p> <p>24 Q. What kind of system was used after the tanks</p> <p>25 were replaced? I am just asking generally, was it an</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. What did you do?</p> <p>2 A. We submitted it.</p> <p>3 Q. No. 4 says, "Annual tightness tests have not</p> <p>4 been performed on pressurized product lines," end quote.</p> <p>5 Do you recall if you took any response to that?</p> <p>6 A. Yes.</p> <p>7 Q. What was that?</p> <p>8 A. If I remember right, this was delayed because</p> <p>9 we were in process to -- landlord was in process to</p> <p>10 change the new tanks and the new pipes and everything.</p> <p>11 That's the reason they are in the permit -- time of</p> <p>12 getting permits and everything. That's why it was not</p> <p>13 done timely after that because we were putting in new</p> <p>14 tanks and new pipes, and all kind of this.</p> <p>15 Q. Do you recall if anyone from the county ever</p> <p>16 indicated that Kerry Oil, the previous owners, had not</p> <p>17 been submitting the information requested here?</p> <p>18 A. No.</p> <p>19 Q. Let me ask you, on the very back page of the</p> <p>20 packet, there's a couple of checked lines. And I think</p> <p>21 there's one that wasn't mentioned in the cover letter.</p> <p>22 It is the third X down, about the middle of the page.</p> <p>23 Says starting with "inventory." You see that line?</p> <p>24 A. Mm-hmm.</p> <p>25 Q. I will read that into the record. It says,</p>	<p style="text-align: right;">Page 57</p> <p>1 electronic system?</p> <p>2 A. Electronic system.</p> <p>3 Q. During the time the stick measurements were</p> <p>4 being taken, how often were those taken?</p> <p>5 A. Every morning.</p> <p>6 Q. Who is responsible for the stick measurements?</p> <p>7 A. The employee who opens the store.</p> <p>8 Q. Was there some kind of reconciliation done to</p> <p>9 try and determine if what was measured with the stick</p> <p>10 matched what was expected to be in the tank?</p> <p>11 A. Yes.</p> <p>12 Q. Can you describe that process?</p> <p>13 A. Our bookkeeping system was like that to --</p> <p>14 because they know how much gas we sold and how much gas</p> <p>15 we missing from the tank, should match.</p> <p>16 Q. Was there a particular amount of gallons of</p> <p>17 discrepancy that would cause reason for investigation if</p> <p>18 what was measured in the tank didn't match what you</p> <p>19 expected to be there?</p> <p>20 A. If it is difference between more than 20, 30</p> <p>21 gallons, we do check it around there.</p> <p>22 Q. Do you recall how many times there was a</p> <p>23 difference of more than 20 or 30 gallons found at the</p> <p>24 station?</p> <p>25 A. Never. I don't remember that happening.</p>

15 (Pages 54 to 57)

<p style="text-align: right;">Page 70</p> <p>1 the items?</p> <p>2 A. I don't remember.</p> <p>3 (Deposition Exhibit 6 marked</p> <p>4 for identification)</p> <p>5 MR. EICKMEYER: I will show you what I have</p> <p>6 marked as Exhibit 6. This is a letter with no</p> <p>7 letterhead on it addressed to Mr. Dhillon. The bottom</p> <p>8 left says "Signed original sent 3/25/97." Bates is</p> <p>9 FCDEH-FRESNO-050245.</p> <p>10 Q. Mr. Dhillon, do you recall ever receiving this</p> <p>11 letter, which I believe indicated was sent by the</p> <p>12 county?</p> <p>13 A. I don't remember that. No.</p> <p>14 Q. Now, it mentions starting in the first sentence</p> <p>15 about a deadline December 22nd, 1998. Does that have to</p> <p>16 do with what you were talking about as reasons that the</p> <p>17 tanks were being replaced?</p> <p>18 A. Yes.</p> <p>19 Q. Do you remember when you first became aware of</p> <p>20 that 1998 change in the requirements?</p> <p>21 A. I don't remember.</p> <p>22 Q. You mentioned as far as obtaining funds to help</p> <p>23 with the tank replacement, did you get any funds from</p> <p>24 the company to help out with tank replacement?</p> <p>25 A. I don't remember. No.</p>	<p style="text-align: right;">Page 72</p> <p>1 Mr. Dhillon, looking at the first page at the</p> <p>2 very bottom under tank owner's name, there is a</p> <p>3 signature and the name next to it Phillip,</p> <p>4 P-h-i-l-l-i-p, looks like Mendrin, M-e-n --</p> <p>5 A. Mendrin.</p> <p>6 Q. Yeah, M-e-n-d-r-i-n, I think. Do you recall</p> <p>7 who that person is?</p> <p>8 A. Contractor. He was the contractor.</p> <p>9 Q. Who is it that hired Mr. Mendrin?</p> <p>10 A. I think we recommended and the landlord hired</p> <p>11 him. I hired him, actually, for the landlord.</p> <p>12 Q. And what was Mr. Mendrin's task at the station?</p> <p>13 What was he hired to do, in other words?</p> <p>14 A. Replace the tank, replace the piping, put the</p> <p>15 new -- the -- whatever the law required at that time to</p> <p>16 bring it update.</p> <p>17 Q. And this would have been in reference to what</p> <p>18 we saw in the -- I think the previous exhibit about the</p> <p>19 change in the requirements that was occurring?</p> <p>20 A. Yes.</p> <p>21 Q. Now, I want to ask on the first page before you</p> <p>22 flip over, at the very top it has No. 7 marked right</p> <p>23 under the state seal. It says "permanently closed</p> <p>24 site," but it wasn't your intention to permanently close</p> <p>25 the station at that point, was it?</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. Do you recall if the landlord, Mr. Prickett or</p> <p>2 his trust contributed any funds toward tank replacement?</p> <p>3 A. Yes, they did. They did it.</p> <p>4 Q. Did you put in any money yourself toward tank</p> <p>5 replacement?</p> <p>6 A. No. The fund money goes to the -- we gave it</p> <p>7 to the landlord and they did it.</p> <p>8 Q. So to your understanding, then, it was either</p> <p>9 the landlord's funds or money from the -- I believe the</p> <p>10 RUST fund that paid for the tank replacement?</p> <p>11 A. Yes.</p> <p>12 (Deposition Exhibit 7 marked</p> <p>13 for identification)</p> <p>14 MR. EICKMEYER: Let me show you Exhibit 7.</p> <p>15 This is a State of California Underground Storage Tank</p> <p>16 Permit Application Form A, Bates FCDEH-FRESNO-050233</p> <p>17 through 050239.</p> <p>18 Q. And if you need a moment to look at it, we will</p> <p>19 be happy to do that. I am going to ask some specific</p> <p>20 questions on the different pages.</p> <p>21 A. Okay.</p> <p>22 Q. For the record, I mentioned Form A is the first</p> <p>23 page, and then that is followed by, I think, five pages</p> <p>24 that are Form B, and then a Uniform Hazardous Waste</p> <p>25 Manifest at the end of the packet.</p>	<p style="text-align: right;">Page 73</p> <p>1 A. Which one is that? On the top?</p> <p>2 Q. Right -- right under the California seal. You</p> <p>3 see it's checked "permanently closed site"?</p> <p>4 A. No, no, no, that shouldn't be checked.</p> <p>5 Q. Were you simply removing and replacing the</p> <p>6 tanks?</p> <p>7 A. Replacing the tanks, yes.</p> <p>8 Q. If we could turn to the second page, then,</p> <p>9 behind the first one, there's a couple of Form Bs I want</p> <p>10 to ask you about. I think that each one refers to a</p> <p>11 different tank, apparently. So this is at the bottom</p> <p>12 right, make sure we are on the same page, the number</p> <p>13 ends in 234.</p> <p>14 A. Mm-hmm.</p> <p>15 Q. Do you find that?</p> <p>16 A. Mm-hmm.</p> <p>17 Q. So this indicates at the top, starting at the</p> <p>18 top under "tank description," a capacity of 10,000</p> <p>19 gallons and below that is checked regular unleaded.</p> <p>20 Do you see that?</p> <p>21 A. Mm-hmm.</p> <p>22 Q. I am sorry. Is that yes?</p> <p>23 A. Yes.</p> <p>24 Q. So for this first tank, is it your</p> <p>25 understanding that there was a 10,000-gallon regular</p>

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<p>1 A. I don't remember.</p> <p>2 Q. Do you recall if you received everything that</p> <p>3 you asked for or if they denied any of the requests?</p> <p>4 A. Because they asked how we are doing -- was</p> <p>5 doing everything. So I don't know -- I can't answer</p> <p>6 exactly. I think we got what we bill for, yes.</p> <p>7 Q. Do you recall if there was ever any time the</p> <p>8 state said that you had received the maximum amount</p> <p>9 allowed, that you couldn't receive any more money?</p> <p>10 A. I don't remember.</p> <p>11 Q. So that was handled by ASR, then, dealing with</p> <p>12 the State Fund?</p> <p>13 A. Yes.</p> <p>14 MR. EICKMEYER: I will show you Exhibit 13.</p> <p>15 (Deposition Exhibit 13 marked</p> <p>16 for identification)</p> <p>17 MR. EICKMEYER: This is a thicker one. Again,</p> <p>18 I am going to ask you some specific questions. If you</p> <p>19 need any time to review it, we will be happy to let you</p> <p>20 do that.</p> <p>21 Exhibit 13 has the logo or letterhead of ASR</p> <p>22 Engineering, Hydrocarbon Impacted Soil Assessment</p> <p>23 Report, M&S Texaco, 2619 South East Avenue, prepared</p> <p>24 for Mr. Paul Dhillon, date toward the bottom center,</p> <p>25 March 4, 1998, Bates FCDEH-FRESNO-051101 through 051183.</p>	<p>1 A. Yes.</p> <p>2 Q. And the table does go on a bit to the top of</p> <p>3 the next page, I think some of the explanations or</p> <p>4 footnotes are there. I want to ask you, do you recall</p> <p>5 under the Table 1, the next to the rightmost column has</p> <p>6 MTBE. Do you see that?</p> <p>7 A. Mm-hmm. Yes.</p> <p>8 Q. And there's some letters and numbers listed</p> <p>9 below that.</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall ever discussing the results of</p> <p>12 any MTBE sampling from the station site with anyone?</p> <p>13 A. No.</p> <p>14 Q. Do you recall Mr. Saboor or anyone expressing</p> <p>15 any concern about the levels of MTBE found at the</p> <p>16 station site?</p> <p>17 A. Yes. He told me all the concerns, what the</p> <p>18 contaminations are, what the county wanted to do, what</p> <p>19 city wanted to do. That's all we discussed with him. I</p> <p>20 never go into technical details, how much it is.</p> <p>21 Q. Besides -- you mentioned contamination in</p> <p>22 general. Do you recall discussing specifically MTBE</p> <p>23 with Saboor?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you recall specifically discussing MTBE</p>
Page 99	Page 101
<p>1 Q. Mr. Dhillon, do you recall receiving this</p> <p>2 report?</p> <p>3 A. Yes.</p> <p>4 Q. Now, I want to ask you on -- if you can turn</p> <p>5 forward, page No. 3 at the bottom center -- page No. 3</p> <p>6 at the bottom center, Bates ending in 107.</p> <p>7 Did you find that page?</p> <p>8 A. Yes.</p> <p>9 Q. The part that is indented in about the middle</p> <p>10 it says, "The property is owned by Glen and Shirley</p> <p>11 Prickett."</p> <p>12 Did that match your understanding as to who</p> <p>13 owned the property at the time?</p> <p>14 A. Yes.</p> <p>15 Q. And below that, "The service station is</p> <p>16 operated by Paul Dhillon." And that would be you?</p> <p>17 A. Yes.</p> <p>18 Q. And it is correct that you were the operator of</p> <p>19 the station during this time period?</p> <p>20 A. Yes.</p> <p>21 Q. Now, if you could turn forward, just turn that</p> <p>22 page one to your left. There is a table starting out on</p> <p>23 the page that will be to your right. Table 1, it is</p> <p>24 titled, Bates ending in 109.</p> <p>25 Did you find that table?</p>	<p>1 found at the station site with anyone from the company?</p> <p>2 A. I don't remember.</p> <p>3 Q. Do you recall ever hearing anyone disagree with</p> <p>4 or dispute the results of the analysis shown in Table 1?</p> <p>5 A. No, nobody -- nobody had any objection on</p> <p>6 these, no.</p> <p>7 Q. Let me ask you to go forward two more pages, if</p> <p>8 you could turn. There's a Table 2. It will start about</p> <p>9 halfway down the page. That looks like it on your right</p> <p>10 side. You see Table 2 there, Bates ending in 113, and</p> <p>11 it goes on to the next page, Bates ending in 114.</p> <p>12 Do you recall discussing these results in</p> <p>13 Table 2 with anyone?</p> <p>14 A. Like I talked to -- told you before, I do not</p> <p>15 go into details of any kind of table, any kind of</p> <p>16 readings. I don't know. I just -- so I just depending</p> <p>17 100 percent on Saboor handling everything with the</p> <p>18 county.</p> <p>19 Q. Do you recall hearing anyone disagree with or</p> <p>20 dispute the results from Table 2?</p> <p>21 A. No, there was no dispute about any kind of</p> <p>22 test.</p> <p>23 Q. During the entire time you were getting reports</p> <p>24 on the station?</p> <p>25 A. Yes, never been disputes.</p>

26 (Pages 98 to 101)

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1 MR. EICKMEYER: You will be happy to hear, I
2 think I am down to my last document. Let me show you
3 Exhibit 29. This is the letterhead of California
4 Regional Water Quality Control Board, date 15 February
5 2011, addressed to Mr. Paul Dhillon with the station
6 address. Bates is FCDEH-FRESNO-052099.

7 Q. Mr. Dhillon, do you recall if you ever received
8 this letter?

9 A. No.

10 Q. No, you don't think that you did?

11 A. I didn't receive this letter.

12 Q. Did you ever contact the water board after you
13 stopped operating the station to ask them to change the
14 name on their records to someone else?

15 A. No.

16 Q. After you stopped operating the station, did
17 you continue to receive any correspondence or reports
18 regarding any environmental cleanup or remediation at
19 the station?

20 A. No. Saboor change everything for me.

21 MR. EICKMEYER: Okay. We can go off the
22 record.

23 THE VIDEOGRAPHER: One moment, please. The
24 time is 11:55 p.m. (sic), and we are going off the
25 record.

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1 MR. EICKMEYER: A.M.

2 (Discussion held off the record)

3 THE VIDEOGRAPHER: The time is 11:59 a.m., and
4 we are back on the record.

5 MR. EICKMEYER: All right. Mr. Dhillon, I have
6 no further questions for you at this point. So as we
7 mentioned, the other attorneys will have the chance to
8 ask you a few questions now. Thank you.

9 THE WITNESS: Thank you.

10 EXAMINATION BY MR. YBARRA

11 MR. YBARRA: Q. Good morning, Mr. Dhillon.

12 A. Good morning.

13 Q. My name is Joseph Ybarra and I represent the
14 Shell defendants.

15 THE VIDEOGRAPHER: One moment, please. His
16 face is turned.

17 MR. YBARRA: All right.

18 THE VIDEOGRAPHER: One moment, please. The
19 time is 11:59 a.m., and we are going off the record.

20 (Discussion held off the record)

21 THE VIDEOGRAPHER: The time is 12 p.m., and we
22 are back on the record.

23 MR. YBARRA: Q. Good morning, Mr. Dhillon.

24 A. Good morning.

25 Q. You mentioned that your company operated the

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1 station at 2619 East Avenue, correct?

2 A. Yes.

3 Q. And your company was called M&S Texaco?

4 A. Yes.

5 Q. Was that a corporation?

6 A. No.

7 Q. Was it a -- some other form of business
8 organization?

9 A. Individual.

10 Q. It was a New York --

11 A. Individual.

12 Q. Oh, individual. Okay. Do you know if it was
13 like a partnership or an LLC?

14 A. No.

15 Q. Okay. Were you the sole owner of M&S Texaco?

16 A. Yes.

17 Q. And you mentioned that you had a supply
18 agreement with Texaco and then later Shell with respect
19 to the station. Right?

20 A. Yes.

21 Q. Was that the only business relationship that
22 you had with Texaco/Shell with respect to this station?

23 MR. EICKMEYER: Vague and ambiguous.

24 THE WITNESS: Can you -- like only for that
25 station or some other station?

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1 MR. YBARRA: Q. Only for that station.

2 A. Yes.

3 Q. The supply -- the -- Texaco/Shell was the
4 supplier of gasoline, right?

5 A. That's right.

6 Q. You didn't have any other business relationship
7 with those companies with respect to that station?

8 A. No.

9 MR. EICKMEYER: Vague and ambiguous.

10 MR. YBARRA: Q. Shell or Texaco never owned
11 the station, to your knowledge, right?

12 A. Yes, they don't own -- they never owned the
13 property, no.

14 Q. Okay. I think it's just a little ambiguous in
15 the answer. To your knowledge, did Texaco ever own the
16 station?

17 A. When you say "own," means like they own the
18 business and property, right?

19 Q. Yes.

20 A. Never did, never own that.

21 Q. Okay. To your knowledge, did Shell ever own
22 the station?

23 A. I don't know.

24 Q. Okay. To your knowledge, did Shell or Texaco
25 ever own the USTs at the station?

37 (Pages 142 to 145)

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1 A. I have no idea.
 2 Q. Okay. To your knowledge, did Texaco or Shell
 3 ever operate the station?
 4 A. I don't think so, no.
 5 Q. Okay. Any of the money that you earned from
 6 operating the station, did you share any of that money
 7 with Texaco or Shell?
 8 A. No.
 9 Q. Did Shell or Texaco have any involvement in
 10 your decisions on whom to hire or fire at the station?
 11 A. No.
 12 Q. You understood as the operator of the station
 13 that you were responsible for complying with the laws
 14 related to equipment like USTs, right?
 15 A. Yes.
 16 MR. EICKMEYER: Vague and ambiguous.
 17 MR. YBARRA: Q. And you understood that you
 18 were responsible for complying with all laws related to
 19 the operation of the gas station. Right?
 20 A. Yes.
 21 MR. EICKMEYER: Vague and ambiguous.
 22 MR. YBARRA: Q. And as the operator, you
 23 certainly didn't want gasoline leaking out of any of
 24 your dispensers, right?
 25 A. No, we don't want it.

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1 Q. Okay. Did you instruct your employees that
 2 they should avoid or try to avoid spilling gasoline into
 3 the environment?
 4 A. Yes, we always train them.
 5 Q. And did you instruct your employees that if
 6 there was a spill or a leak of gasoline that it should
 7 be cleaned up quickly?
 8 A. Yes.
 9 Q. All right. In fact, that was your purpose in
 10 hiring the consultant, ASR, right?
 11 A. Yes.
 12 Q. All right. Who paid for the consultant, ASR?
 13 A. At that time, like if there is a -- state pays
 14 that. If there's any extra bill, I pay that.
 15 Q. Okay. So it was the state, to the extent the
 16 state paid; if there was something additional that you
 17 paid?
 18 A. Yes.
 19 Q. Did you understand that gasoline could be
 20 dangerous if it was leaked into the environment?
 21 A. Definitely.
 22 Q. Okay. Did it depend in your mind whether or
 23 not that gasoline contained MTBE?
 24 MR. EICKMEYER: Object as vague and ambiguous.
 25 THE WITNESS: Yeah, I think there was MTBE

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1 before they used to use it in gasoline.
 2 MR. YBARRA: Q. But would gas -- in your mind,
 3 was gasoline dangerous if it reached the environment
 4 whether or not it contained MTBE?
 5 A. Yes.
 6 Q. Okay. And you understood that it was important
 7 to prevent leaks of gasoline into the environment --
 8 A. Yes --
 9 Q. -- regardless -- excuse me. Just let me
 10 finish.
 11 And you understood it was important to prevent
 12 leaks of gasoline into the environment regardless of
 13 whether or not the gasoline contained MTBE, right?
 14 A. Yes.
 15 MR. EICKMEYER: Vague and ambiguous.
 16 MR. YBARRA: Thank you, sir. I have no further
 17 questions.
 18 THE WITNESS: Thank you.
 19 MR. EICKMEYER: On the phone?
 20 MS. LUGO: This is Freeda Lugo, Nella Oil
 21 Company. I don't have any questions. Thank you.
 22 MS. OSEROFF: ...from Kern Oil, and we have no
 23 questions.
 24 MR. DICHELLO: This is John DiChello. No
 25 questions.

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1 MR. EICKMEYER: I have got a few follow up. I
 2 think I can ask from here, if everybody can hear me.
 3 EXAMINATION BY MR. EICKMEYER
 4 MR. EICKMEYER: Q. Let me just ask, sir, I'm
 5 not sure if we clarified. We talked before about, I
 6 think you called them area reps that would come by on
 7 occasion?
 8 A. Yes.
 9 Q. During the years it was a Texaco branded
 10 station, were those area reps coming out from the Texaco
 11 company?
 12 A. Yes.
 13 Q. During the years it was a Shell branded
 14 station, were those area reps from the Shell Company?
 15 A. Yes.
 16 MR. EICKMEYER: Okay. Nothing further. Thank
 17 you.
 18 MR. YBARRA: Nothing on mine.
 19 MR. EICKMEYER: Anybody else on the phone?
 20 Hearing nothing, I guess we can conclude.
 21 THE VIDEOGRAPHER: One moment, please. This
 22 concludes today's proceedings in the deposition of Paul
 23 Dhillon. The number of videotapes used is a total of
 24 three. We are now going off the record, and the time is
 25 12:06 p.m.

38 (Pages 146 to 149)

Shell Defendants' Responses to City of Fresno's First Set of Interrogatories to Defendants
Exhibit B

A	B	C	D	E	F	G	H	I	J	K
LOCATION NO	VALID FROM DATE	VALID TO DATE	LOCATION BRAND NAME	STREET ADDRESS	CITY	STATE	ZIP CODE	COUNTY	PRIMARY BUSINESS OPER DESC	PRIMARY BUSINESS DESC
1										
317 121746	2001	2001	TEXACO	1016 WEST SHAW AVENUE	FRESNO	CA	93704	FRESNO	CORO	OPEN FOR BUSINESS
318 121746	2002	2002	TEXACO	1016 WEST SHAW AVENUE	FRESNO	CA	93704	FRESNO	CORO	OPEN FOR BUSINESS
319 121746	2002	2002	TEXACO	1016 WEST SHAW AVENUE	FRESNO	CA	93704	FRESNO	CORO	OPEN FOR BUSINESS
320 121746	2003	2003	TEXACO	1016 WEST SHAW AVENUE	FRESNO	CA	93704	FRESNO	CORO	OPEN FOR BUSINESS
321 121746	2003	2003	TEXACO	1016 WEST SHAW AVENUE	FRESNO	CA	93704	FRESNO	CORO	OPEN FOR BUSINESS
322 121776	1998	1998	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
323 121776	1999	1999	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
324 121776	1999	1999	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
325 121776	1999	1999	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
326 121776	2000	2000	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
327 121776	2000	2000	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
328 121776	2001	2001	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
329 121776	2001	2001	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
330 121776	2002	2002	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
331 121776	2002	2002	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
332 121776	2003	2003	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
333 121776	2003	2003	TEXACO	2619 SOUTH EAST AVENUE	FRESNO	CA	93706	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
334 121793	1998	1998	TEXACO	4090 S. CHESTNUT	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
335 121793	1998	1998	TEXACO	4090 S. CHESTNUT	FRESNO	CA	93727	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
336 121793	1998	1998	TEXACO	4090 S. CHESTNUT	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
337 121793	1999	1999	TEXACO	4090 S. CHESTNUT	FRESNO	CA	93727	FRESNO	OPEN DEALER	OPEN FOR BUSINESS
338 121793	1999	1999	TEXACO	4090 SOUTH CHESTNUT AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
339 121793	2000	2000	TEXACO	4090 SOUTH CHESTNUT AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
340 121793	2001	2001	TEXACO	4090 SOUTH CHESTNUT AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
341 121793	2002	2002	TEXACO	4090 SOUTH CHESTNUT AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
342 121793	2003	2003	TEXACO	4090 SOUTH CHESTNUT AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
343 121794	1998	1998	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
344 121794	1998	1998	TEXACO	4149 N CLOVIS AVE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
345 121794	1998	1998	TEXACO	4149 N CLOVIS AVE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
346 121794	1998	1998	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
347 121794	1999	1999	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
348 121794	1999	1999	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
349 121794	2000	2000	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
350 121794	2001	2001	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
351 121794	2002	2002	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
352 121794	2003	2003	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93727	FRESNO	OPEN DEALER	ARCHIVED
353 121853	1998	1998	TEXACO	4149 NORTH CLOVIS AVENUE	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
354 121853	1998	1998	TEXACO	1410 W VENTURA	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
355 121853	1999	1999	TEXACO	1410 W VENTURA	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
356 121853	2000	2000	TEXACO	1410 W VENTURA	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
357 121853	2001	2001	TEXACO	1410 W VENTURA	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
358 121853	2002	2002	TEXACO	1410 W VENTURA	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
359 121853	2003	2003	TEXACO	1410 W VENTURA	FRESNO	CA	93706	FRESNO	LESSEE	ARCHIVED
360 124005	1998	1998	TEXACO	1506 VAN NESS AVE	FRESNO	CA	93721	FRESNO	BRANDED WHOLESALE	ARCHIVED
361 124005	1998	1998	TEXACO	1506 VAN NESS AVE	FRESNO	CA	93721	FRESNO	BRANDED WHOLESALE	OPEN FOR BUSINESS